
OAR Box 1214

Prepped by Ollie Stewart

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IV-D-12**Ashland Petroleum Company**

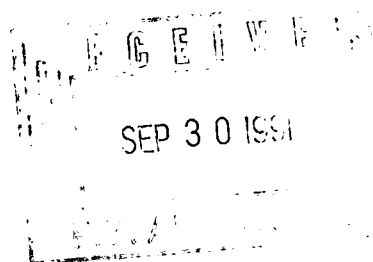
DIVISION OF ASHLAND OIL, INC.

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ROBERT E. YANCEY, JR.
President

September 24, 1991

Environmental Protection Agency
Public Docket A-91-46
Air Docket (LE-131)
401 M Street, SW
Room M-1500
Washington, DC 20460



Gentlemen:

This letter is in support of the July 12, 1991, waiver request to the USEPA by the Ethyl Corporation to allow the introduction into commerce of the addition of the gasoline additive methylcyclopentadienyl manganese tricarbonyl (MMT) in unleaded gasoline at a concentration up to 0.03125 grams per gallon manganese. Ashland Petroleum has reviewed the data accompanying the waiver citing the effects of the addition of Ethyl's HiTEC® 3000, MMT additive, in unleaded gasoline. Our support is based on the data showing the presence of this additive in gasoline offers reduction of NO_x in automotive exhaust emissions.

Control and reduction of NO_x emissions in automotive exhaust is particularly critical in reformulated gasoline composition and manufacture. The potential for NO_x reduction would offer additional economic flexibility to gasoline manufacturers in meeting clean air goals. Based on the data presented and the potential for NO_x reduction, Ashland Petroleum supports the Ethyl Corporation waiver for MMT addition to unleaded gasoline and recommends the administrator grant said waiver.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. E. Yancey, Jr.", written in dark ink.

REYJ:gb

cc: Mary T. Smith
Director Field Operation and Support Division (EN-397F)
U.S. Environmental Protection Agency